6

THE HONORABLE MARC L. BARRECA

FILED
Western District of Washington
at Seattle
AUG 31 2012
MARK L. HATCHER, CLERK
OF THE BANKRUPTCY COURT

THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re

ADAM R. GROSSMAN

NO. 10-19817

STATEMENT IN OBJECTIONTO PROPOSED ORDER ON CLAIMS: TSAI LAW COMPANY

ADAM R. GROSSMAN
5766 27TH AVE NE
SEATTLE, WA 98105
646-342-1994
BK@ADAMREEDGROSSMAN.COM

The allocation of $30,000 to the Tsai Law Company PLLC for Chapter 11 administrative claims shown by the Trustee on Page 9 of the proposed order is not correct.

The Court has already found that fees, costs, and expenses in the amount of $62,079 (Docket No. 196) were "reasonable" and therefore ordered that they be "approved" provisionally. This seems to imply "provisionally" until such time that all other claims of equal priority can also be paid at 100%. That time is now thus the approval is no longer provisional. The correct amount already approved of $62,079 should be reflected in the claims.

ADAM R. GROSSMAN
5766 27TH AVE NE
SEATTLE, WA 98105
646-342-1994
BK@ADAMREEDGROSSMAN.COM

The Tsai Law Company PLLC should be praised by the trustee.

Emily Tsai, more than any other person, deserves the Nobel Prize in Protecting and Preserving the assets of the estate.

First, the trustee has complained about redacted parts of their billings but others have said that their billings were slightly understated; I do not wish to waive attorney-client privilege but to the extent possible, I concur with this statement made by others.

Second, Emily Tsai was the only person in the court room on November 15, 2010, who correctly understood bankruptcy law and the jurisdiction of the bankruptcy court when she started to address the court, "I just wanted to bring to the Court's attention the issue of the bankruptcy and the powers of the bankruptcy court" before being interrupted twice, resulting in an error of law propagated to today that the trustee recently stated would cost an additional $25,000 in litigation expenses to correct.

Third, in November, 2010, two or more people, possibly three who received financial benefit paid by the same organization, agreed in advance to engage in or causing the performance of such conduct that included making false statements known to be false by the speaker(s) at the time they were made and omitting facts or suppressing information which, in light of the circumstances under which they were made, would be necessary to make the statements not misleading, or to employ a scheme or artifice or to engage in any act, practice, or course of conduct for the purpose, intent, and goal of knowingly and willfully misrepresenting to people, or failing to inform them, of material facts upon which they relied, directly or indirectly, in connection with the purchase of sale of securities offered by the Tanager Fund LP, regulated by the SEC and filed under Regulation D §504 and §505 exempt from registration but subject to the full force and powers pursuant to The Act, as amended, with restrictions set forth therein including the use of

ADAM R. GROSSMAN
5766 27TH AVE NE
SEATTLE, WA 98105
646-342-1994
BK@ADAMREEDGROSSMAN.COM

any means or instrumentality of interstate commerce, or of the U.S. Mail, or of electronic wires across state lines, for the ultimate goal of deceiving other people, defrauding investors, and taking the property belonging to one or more people. The Tsai Law Company consistently opposed this defrauding of investors.

Fourth, Jill Borodin directly and/or through her attorney falsely represented the ownership of property, assets or the equivalent value in the amounts of $255,000, $101,617, $281,619, $278,000, and $255,000 (again) and $215,000 which have been cited to justify the attempted, and twice successful fraudulent or unauthorized taking, of property belonging to other people, companies, or assets claimed by the bankruptcy estate.

Fifth, this included the removal post-petition; without prior approval of the bankruptcy court; absent notice, a motion, and a hearing; not while acting as debtor in possession; nor in the course of business; for no present consideration; and for no future consideration, assets claimed by the bankruptcy estate which have yet to be returned and for which liability to the estate for this unauthorized removal potentially still exists.

Sixth, only due to the efforts of the Tsai Law Company PLLC, is the estate not facing a deficit nearly $1m worse than it is now as the Tsai Law Firm steadfastly, and generally successfully, opposed the false and fraudulent representations that have defrauded investors and overstated assets in the estate.

Dated August 31, 2012, signed in Seattle, WA.

s/Adam R. Grossman/

ADAM R. GROSSMAN
5766 27TH AVE NE
SEATTLE, WA 98105
646-342-1994
BK@ADAMREEDGROSSMAN.COM

RECEIVED

2012 AUG 31 PM 11:56

M.L. HATCHER, CLK
U.S. BANKRUPTCY COURT
W.D. OF WA AT SEATTLE

BY__________ DEP CLK.